UNITED STATES DEPARTMENT OF THE INTERIOR
BLM, IDAHO STATE OFFICE

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Simplot Short Term Holding Facility

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Simplot Short Term Holding Facility

Environmental Assessment
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1.0 Introduction

The Bureau of Land Management proposes to fund the holding and maintenance of a short-term holding (STH) facility for a maximum of 3,500 excess wild horses and burros (WHBs).

The Wild Free-Roaming Horse and Burro Act (WFRHBA) became a Federal law in 1971. The WFRHBA requires the protection, management and control of WHBs on public lands at population levels that assure a thriving natural ecological balance and multiple use relationship is achieved and maintained. BLM is responsible for the management of these animals within 179 herd management areas on public lands in ten western states. The primary purpose of herd management is to protect both the animals and their habitat. WHB herds increase at relatively high rates in North America because they have low susceptibility to disease or predation. When populations of wildlife, WHBs, or domestic livestock exceed the productive capabilities of their habitat, habitat condition begins to decline, and there is no longer a thriving natural ecological balance. A prolonged decline in habitat condition can lead to deteriorated range condition and a decline in WHB health. If these animals are not removed from these deteriorated rangelands, they can die from starvation, dehydration, or succumb to the elements. When these conditions arise, the BLM is required to remove the excess animals. In order to maintain healthy landscapes and healthy WHB populations, active management including removal is critical.

Excess WHB removed from the public lands are placed in STH facilities where they are prepared for adoption (private maintenance) through the BLM Adopt-A-Horse program, made available for sale to individuals who can provide good homes, or sent to long-term pastures on private lands mostly in the mid-western United States. WHB are prepared at BLM-operated STH facilities; animals newly arrived at these STH facilities are examined, sorted by sex, age and condition, tested for infectious diseases, vaccinated and treated by a veterinarian. The animals are also freeze marked on the neck with a unique number to facilitate identification and given booster vaccinations within 30 days. While the animals are at the STH facility, they are fed grass and/or alfalfa hay and are also closely observed for sickness, injury, loss of appetite and other factors that may affect their health and welfare. Sick or injured animals are separated and quarantined from the general population.

1.1 Need for and Purpose of Action

The WHB program is in need of additional STH capacity. This new facility would accommodate WHBs that have been gathered from public lands within herd management areas (HMAs), and provide safe, humane care of these animals. The purpose of this proposed action is to fund space, feeding, and care for up to 3,500 excess WHBs. The BLM solicited bids from private organizations and individuals capable of building and operating such a facility. The proposed action evaluates the bid received as a result of that process.

1.1.1 Decision to be Made

The Idaho Deputy State Director for Resources is the authorized officer responsible for the decision regarding the impacts of funding this project. Based on the results of the NEPA analysis, the Idaho Deputy State Director will decide if and under what conditions, stipulations, and terms a STH facility would be funded to provide space, feed, and care of WHBs.

1.2 Summary of Proposed Action

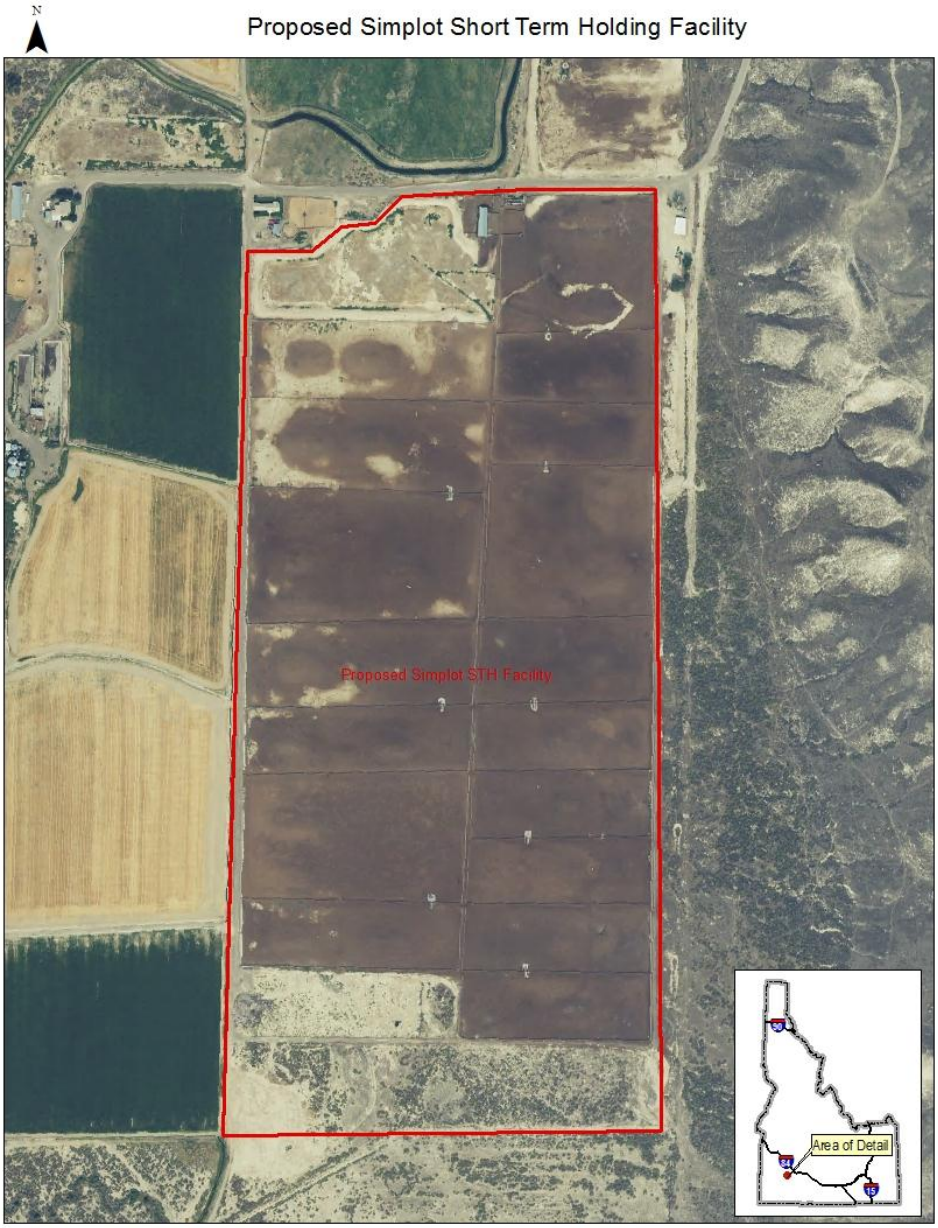
The Proposed Action is to fund space, feeding, and care for up to 3,500 excess WHBs on 80 acres of private land owned by the contractor just off of Highway 78 on Jacks Creek Road, in Owyhee County, near Bruneau, Idaho.

1.3 Location and Setting

The proposed facility is located on private land in north central Owyhee County, three miles west of Bruneau, Idaho. The proposed facility lies just west of the Bruneau River Valley and encompasses approximately 80 acres of private land that has been used as a livestock feedlot for several years (sources have stated that the site was constructed into a feedlot over 50 years ago). A primary land use identified in the Owyhee County Comprehensive Plan contains Agricultural Land Use, which includes ranching and farming. A request for a Concentrated Animal Feeding Operation (CAFO) was filed with the Owyhee County Planning and Zoning Commission by J.R. Simplot Co. seeking to establish an eighty acre facility to feed a maximum of 3,500 WHBs, or alternately 3,500 cattle, or a combination of the two for this site. Legal: Township 6 South, Range 5 East, Sections 21 & 28.

Photo 1. Overview of Proposed Location (proposed site is area with darker shaded bare ground).

Map 1. Aerial photo of project location.



1.4 Conformance with Applicable Land Use Plan

The Bruneau Field Office does not include any WHB herd management areas, therefore, the Bruneau Management Framework Plan (BMFP, 1983) is silent on WHBs. However, the BMFP does not disallow such a management action, and this action is not inconsistent with the goals and objectives stated in the BMFP of maintaining and improving rangeland health conditions. This EA incorporates by reference the BMFP and also incorporates Solicitation # L14PS00389 by reference because of the specifications for construction and care of the animals.

1.5 Relationship to Statutes, Regulations, and Other Requirements

The Proposed Action does not conflict with any known State or local planning or zoning ordinance. This action is not specifically addressed in the County's plan; however, the proposal

is consistent with the land uses occurring within the area. The award of a contract to fund space, feeding, and care of up to 3,500 excess WHBs at a STH facility on private land is considered a Federal action which requires BLM to comply with all applicable laws, including the National Environmental Policy Act (NEPA). As a result, this Environmental Analysis (EA) has been prepared to document BLM's site-specific analysis of the potential impacts that could result with the implementation of the Proposed Action or No Action alternatives. The following statutes and resultant regulations are of primary concern to this environmental assessment:

- The National Environmental Policy Act of 1969, as amended.
- The Wild Free-Roaming Horse and Burro Act of 1971, as amended.
- Title 43 Code of Federal Regulations (CFR) §4700.
- National Historic Preservation Act of 1966, as amended (1992).
- Threatened and Endangered Species Act of 1973, as amended.
- Idaho Statutes
- Owyhee County Comprehensive Plan of 2002, as amended.

1.6 Scoping and Development of Issues

The proposed project was brought forward to the interdisciplinary team on March 2, 2015, for scoping. The proposed project is entirely located on private land however; federal funds would be utilized thereby triggering a federal action.

A scoping document was sent to the public on March 20, 2015 for review and comment of the proposed action and alternatives. The following issues were identified:

1. The potential exists for nutrient loading from runoff to occur in nearby Jack's Creek, a tributary to C.J. Strike reservoir. The project is designed to minimize or eliminate these impacts and is described in the analysis of effects. (BLM Developed)
2. Concerns about holding up to 3,500 WHB's on only 80 acres. This issue is addressed in Section 2.2, "Issue Considered But Not Carried Forward in Analysis." (Interested Public)
3. Review rules and regulations for Air Quality, Wastewater and Recycled Water, Drinking Water, Surface Water, Hazardous Waste and Ground Water Contamination, and Storage Tanks. Best management practices (BMPs) for wash water from cleaning vehicles, fertilizers and pesticides, animal facilities, composted waste, and ponds are recommended for use to address this issue. (Idaho Department of Environmental Quality (IDEQ))

2.0 Description of the Alternatives

2.1 Alternative Development Process

Alternative 1 was developed based on requests for proposals received through Solicitation # L14PS00389 (WHB Temporary Holding Facility). Alternative 2 was developed as the No Action alternative. No additional alternatives were submitted through scoping.

2.2 Issue Considered But Not Carried Forward in Analysis

During scoping, a comment raised concerns about how the proposed STH facility could hold 3,500 WHBs at an 80 acre facility. When WHBs are adopted, the BLM requires potential adopters to provide 400 square feet per WHB (43 CFR 4750.3-2(a)(3)(i)) to ensure a sufficient

amount of space. This short-term holding facility would provide several pens, each capable of holding about 100 WHBs with approximately 70,000 square feet per pen. A minimum amount of required square footage is 700 per WHB, 300 square feet more per WHB than is required by an adopter. Therefore, the square footage provided for each WHB at this short-term holding facility would provide for the health and safety of the WHBs.

In addition to adequate space, Solicitation # L14PS00389 and the subsequent contract would require adequate feed, water, handling, and safe facilities/working environment for WHBs. There are several other STH facilities throughout the west in similar settings/climates with the same or similar requirements. The conditions as a result of these requirements in these other facilities have shown to provide humane care for the animals. Regardless of where these WHBs are cared for, any WHB that is removed from public land will be cared for in a similar facility with the same or similar requirements. As such, this issue will not be carried forward for detailed analysis because there is no difference between alternatives or facilities.

2.3 Description of Proposed Action and Alternatives

This section of the EA describes the Proposed Action and Alternatives, including any that were considered but eliminated from detailed analysis. Two alternatives are considered in detail: the Proposed Action Alternative and the No Action Alternative. The Proposed Action meets BLM's need for a short term WHB holding facility because it provides the necessary space for a STH facility to safely and humanely care for excess WHB removed from lands in accordance with the WFRHBA.

2.3.1 Alternative 1 – Proposed Action

The Proposed Action is to fund space, feeding, and care for up to 3,500 excess WHBs on 80 acres of private land owned by the contractor just off of Highway 78 on Jacks Creek Road, in Owyhee County, near Bruneau, Idaho. The STH facility would:

- provide pens, feed, salt, minerals and water necessary for maintaining a maximum of 3,500 WHB;
- provide corrals and adequate working facilities to load, unload, prepare, and sort WHB;
- provide humane care of all WHB from receiving, to holding, and preparation and maintenance (including veterinarian care, hoof trimming, etc.), prior to adoption, sale or shipment to long-term holding facilities;
- provide regular, on-the-ground observation of WHB, by BLM employees, to ascertain their well-being and safety; and
- provide management by individuals who are knowledgeable and experienced about the behavior and nutritional requirements of equines.

The corrals and working facility would be constructed of stout pipe, at least 72" high, and free of protrusions and hazards. Corrals would be constructed within the main footprint where the manure is located and a majority of the disturbance has already occurred (see Photo 3 below). Other buildings and the working facility would be constructed on the south end where manure is not present, but the site is void of much vegetation (see Photo 4 below). Gates would be constructed of similar material and at the same height as the fences. Slopes within the pens shall provide for adequate drainage. Pens would allow for a maximum of 100 WHB per pen. Each pen would allow 700 square feet per animal, or about 70,000 square feet per pen. Separate corrals at

the facility would be available for confining lame or sick animals needing special care. Once constructed, the pens would be cleaned and proper dust abatement would be required at the direction of the BLM authorized officer.

A perimeter fence at least 48 inches in height would be provided around the facility in the event a WHB escapes from an individual pen. Entry gates would have the ability to be locked during non-work hours to provide for WHB safety. Feed (grass/alfalfa hay) would be stored in quantities appropriate to the number of WHB on site at all times. No chopped hay or feed products would be used as feed for these animals. Some animals may require grass hay or additional feed in coordination with the BLM employees (Contracting Officer's Representative/Project Inspector, COR/PI) to ascertain their well-being. Processed hay (cubes, chopped, pelleted or other processed) would need to be approved by the BLM (COR/PI). Animals would be fed daily. Granulated, rock, or block salt would be accessible to all WHB in each pen. Minerals necessary to maintain WHB in good condition would be provided to WHB in each pen as a supplement or added to the salt. An inventory of WHB kept at the site would be maintained along with all treatments and records of deaths. WHB would be observed daily. Any remains would be disposed of in accordance with State or local sanitation laws.

County building permits in addition to all other required permits would be the responsibility of the contractor. The contractor would be responsible for obtaining the necessary permits required for a Concentrated Animal Feeding Operation (CAFO) from the State of Idaho and for the construction and maintenance of any infrastructure associated with the CAFO permit. Each pen would have a reliable water source capable of supplying a minimum of 16 gallons of clean water per animal, per day.

J.R. Simplot Co. would develop a working animal waste management plan which would be designed to meet the following objectives:

- Prevent water pollution and maintain or improve surface water resources;
- Collect and store all solid and liquid waste on-site in a manner that prevents wastes from entering surface water and seepage of nutrients into ground water;
- Manage both solid and liquid wastes, preferably by proper land application for crop production and soil enhancement without excessively loading the soils profile which could result in ground water pollution;
- Control odors, flies, rodents, and other vermin;
- To use and store pesticides in a manner as to not adversely affect water quality or the environment.

J.R. Simplot Co. would prepare a detailed dust prevention and control plan and submit it to IDEQ for their review.

The proposed facility would also incorporate the following (and not limited to) Best Management Practices (BMP's) through proper design and construction:

- Ensure that runoff from the hill slopes above the facility are disconnected from the holding facility.
- Elevate and improve upon the existing earthen embankment that exists between the holding facility and Jacks Creek. Ensure that all water from the holding facility flows

unimpeded to the lowest point (settling basin) of the facility by re-contouring the holding facility to a uniform gradient.
- Ensure proper maintenance of the settling basin.
- Prevent runoff from exiting the holding facility via roads that enter the facility.

2.3.2 Alternative 2 – No Action

The No Action Alternative would not fund nor authorize the holding of WHB at this location.

3.0 Affected Environment and Environmental Consequences

This chapter identifies and describes the current condition and trend of elements or resources in the human environment which may be affected by the Proposed Action or Alternatives and the potential direct/indirect/residual/cumulative impacts to resources that may result from the Proposed Action or Alternative, as well as identifies the potential mitigation measures and monitoring needs associated with the specific resources.

Direct impacts are those that result from the management actions while indirect impacts are those that exist once the management action has occurred. By contrast, cumulative impacts result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

It is expected that the J.R. Simplot Co. would use this facility as a cattle feedlot without any federal funding (therefore not considered a federal action) because of their recent request for a CAFO seeking to establish this feedlot for WHBs or cattle. However, no analysis will be completed for Alternative 2 because it does not constitute a federal action and is not required by NEPA.

3.1 Soils

3.1.1 Affected Environment – Soils

The soils within the project area consist of a Bramwell silty clay loam (~80%), Garbutt silt loam (~15%), and Bram silt loam (~5%). These soils are very deep and range from somewhat poorly drained to well drained. Permeability is mostly slow. A majority of the runoff is very slow, hazard of water erosion is slight, and hazard of wind erosion is moderate. Substantial change in the surface layer of the soils is likely due to the presence of a previous feedlot. However, soil profiles are likely intact, but under layers of manure and decomposed hay.

Photo 2. Representative photo of soils on site (corral location).

3.1.2 Environmental Consequences – Soils

3.1.2.1 Alternative 1

The soil conditions under this alternative would remain largely unchanged within the existing footprint of this holding facility. It can be expected that accumulations of manure and unused feed would build up to a point where it would then need to be removed. The removal would stop short of actually excavating the existing soil profile. The soil profile below the holding facility would remain unaltered. Design features, the dust prevention and control plan, and the animal waste management plan would reduce the risk of runoff and erosion. These plans would ensure all solid and liquid wastes are stored on-site in a manner that prevents wastes from entering surface water and seepage of nutrients into ground water. Additionally, runoff from hill slopes above would be disconnected at the facility boundary, and all water from the holding facility would flow unimpeded to the lowest point in the settling basin.

There would be limited amounts of construction to build facilities associated with the holding facility. Corrals would be constructed within the main footprint where the manure is located and a majority of the disturbance has already occurred (see Photo 3 below). Other buildings and the working facility would be constructed on the south end where manure is not present, but the site is void of much vegetation (see Photo 4 below).

There would be no net change in soil productivity within the existing footprint of the holding facility from what currently exists.

3.1.2.2 Alternative 2

As a reminder, Alternative 2 would result in the BLM not funding the development of a STH facility for WHBs, thereby eliminating a Federal Action. It is speculative to say that if the BLM would select this alternative, it would be likely that the parcel would once again become a livestock feeding facility, and since this activity would be beyond the BLM's influence, the effects of this would be outside the scope of this analysis.

3.2 Upland Vegetation/Noxious Weeds

3.2.1 Affected Environment – Upland Vegetation/Noxious Weeds

Upland vegetation on the existing site consists of a very small amount of weeds. A site visit on March 26, 2015 concluded that very little vegetation occurs on the area of evaluation, which consisted mostly of Russian thistle, tumble mustard, and cheatgrass. One perennial grass (Kentucky bluegrass) was identified on the edge of the road ways. No noxious weeds identified on the State of Idaho's noxious weed list were found during the site visit. A large majority of the site (>90%) is bare ground with a mix of manure because of the previous use of this location as a feedlot for cattle and other livestock. Buildings have been removed and almost complete removal/disturbance of vegetation has occurred. This site has been so disturbed and modified, it is highly unlikely that native perennial plants could ever reestablish on this site without significant restoration and seeding, and only after the use of the land as a feedlot ceased.

Photo 3. Representative photo of vegetation on site (corral location).

Photo 4. Representative photo of vegetation on site (facility location).

3.2.2 Environmental Consequences – Upland Vegetation/Noxious Weeds

3.2.2.1 Alternative 1

Implementation of the Proposed Action would not have any effect on the current vegetation because the site has been disturbed to such a large extent. Due to the lack of current vegetation and extensive amount of bare ground, the Proposed Action would not decrease the site potential or current vegetation any further. A significant amount of restoration would have to take place for any native vegetation to establish. Additionally, no noxious weeds were found during the site visit, therefore no new noxious weeds are expected to be established by implementation of the Proposed Action. There has been a significant amount of disturbance and seed dispersal agents (cattle, birds, etc.) in the past to provide the niche for noxious weed species, including previous use of a feedlot for cattle. Because this previous use has not promoted any noxious weeds to date, there is a very low likelihood that the Proposed Action would increase that risk.

3.2.2.2 Alternative 2

Please see the statement regarding Alternative 2 in Section 3.1.2.2, above. This statement applies to all analysis of Alternative 2.

3.3 Riparian/Aquatic Resources/Water Quality

3.3.1 Affected Environment – Riparian/Aquatic Resources/Water Quality

No streams, springs, or rivers occur within the project location. However, Jacks Creek is approximately 0.13 miles from the proposed facility. Although a canal is within 100 feet of the proposed facility, a pipeline has recently been installed and the canal is no longer in use. The previous facility coordinated with the State of Idaho DEQ and Department of Agriculture to develop a waste and wastewater management system that prevented contamination of ground and surface waters from the facility. This facility was successful in complying with state and federal water quality regulations. A new animal waste management plan would be developed for the new proposed facility.

3.3.2 Environmental Consequences – Riparian/Aquatic Resources/Water Quality

3.3.2.1 Alternative 1

The operators of the holding facility would be responsible for complying with all state and federal laws pertaining to the protection of surface and ground waters. Design features and the animal waste management plan would reduce the risk of runoff and erosion. The plan and BMPs would ensure all solid and liquid wastes are stored on-site in a manner that prevents wastes from entering surface water and seepage of nutrients into ground water. Additionally, runoff from hill slopes above would be disconnected at the facility boundary, and all water from the holding facility would flow unimpeded to the lowest point in the settling basin. The plan would also prevent water pollution and maintain or improve surface water resources. The facility would be hydrologically isolated and all water would be treated onsite to meet state and federal water quality standards. Therefore, no impacts to riparian, aquatic resources, or water quality are expected and all state and federal water quality regulations are expected to be met.

3.3.2.2 Alternative 2

Please see the statement regarding Alternative 2 in Section 3.1.2.2, above. This statement applies to all analysis of Alternative 2.

3.4 Air Quality

3.4.1 Affected Environment – Air Quality

Air quality in a given area is described by the concentration of various pollutants in the atmosphere. The IDEQ has the primary responsibility to carry out the requirements of the Federal Clean Air Act (CAA) in Idaho.

Air quality in the project area is considered good due to the rural setting and distance from any affecting sources. Consequently, ambient pollutant concentrations have rarely been monitored. The nearest monitoring stations are located in Boise where particulate matter (PM10) and carbon monoxide (CO) are of concern. Recent monitoring in the Treasure Valley area show two new pollutants of concern – fine particulate (PM2.5) and ozone (O_3). The BLM would meet or exceed the National Ambient Air Quality Standards (NAAQS) and the Prevention on Significant Deterioration (PSD) regulations with all authorized actions.

IDEQ is responsible for regulating fugitive dust emissions in Idaho. Authority is based upon the Rules for the Control of Air Pollution in Idaho (IDAPA 58.01.01.651), which requires that all "reasonable precautions" be taken to prevent particulate matter from becoming airborne. Reasonable precautions include using water or chemical, applying dust suppressant, using control equipment, covering truck, paving, and removing materials.

Dust is particulate matter consisting of very small liquid and solid particles. Fugitive dust is suspended in the air primarily from soil that has been disturbed by wind or human activities, such as earth work and vehicular traffic on unpaved surfaces.

When regulating fugitive dust, DEQ considers the proximity of dust emitting operations to human habitations or activities and atmospheric conditions that might affect the moment of particulate matter. Failure to reasonably control fugitive dust emissions may result in respiratory illness, lung damage and may result in enforcement action by DEQ with possible penalties assessed.

3.4.2 Environmental Consequences – Air Quality

3.4.2.1 Alternative 1

If this 80-acre parcel would be operated as a STH facility in its current condition, dust abatement would be a primary concern, however, a detailed dust prevention and control plan would be prepared to reduce and/or eliminate any dust. The land is unvegetated, compacted in many places, exposed to wind, and contains soils with fine erodible particles. Unchecked, these conditions could be a concern to the health and welfare of the animals, employees of the facility, and to persons living in the immediate area. The truck traffic that would be involved in transport and feeding operations along with the hoof action from moving horses would cause a lot of dust during dry conditions. Design features of this alternative would reduce the dust abatement concerns. For example, these include: 1) leaving a layer of composted manure on top of the soil profile to act as a cap which would reduce the dust from hoof action inside the pens, 2) all access roads and feeding routes around and within the facility would be graveled and asphalted to reduce/eliminate dust and to provide a solid bed for truck travel. Feeding trucks would deliver feed on to concrete surface feedbunks.

3.4.2.2 Alternative 2

Please see the statement regarding Alternative 2 in Section 3.1.2.2, above. This statement applies to all analysis of Alternative 2.

3.5 Cultural/Paleontological Resources

3.5.1 Affected Environment – Cultural/Paleontological Resources

The area of potential effect (APE) for this proposal is comprised entirely of private land currently owned by the J. R. Simplot Company. According to the BLM General Land Office Records website, the original title to this parcel was issued to Fred J. Born on August 27, 1914 under the May 20, 1862 Homestead Act. The tract covered a total of 160 acres of which the proposed 80 acres is a part. No record has been found that indicates for what initial purpose the land was used, however, a local informant reports that it has been a feedlot for over 50 years.

Due to the fact that federal government funds would be spent if the project is approved, a NHPA Section 106 cultural resources survey is required. Because the land has been in private ownership for over 100 years, no cultural resources inventories are known to have been conducted on the property and, consequently, there are no previously recorded sites or isolated artifact finds listed for the project area. BLM administered land does border the APE to the east and one isolated find is recorded there. The artifact was collected in 1981 and a March 2015 visit to the location found no other cultural material in the area.

The project area lies on the Glenns Ferry Formation of paleontological sediments. There have been no previous paleontological surveys conducted and there are no recorded fossil sites on or within 2.5 miles of the project area.

Prior to the cultural and paleontological resources inventory of the project area on March 26, 2015, approximately 8 to 12 inches of surface deposits within the APE had been removed from the feedlot area, but an estimated 12 inches of the same material is estimated to remain. These deposits consist primarily of livestock droppings accumulated over several decades and actual geological sediments are not visible. The proposed location of the building construction outside the pen at the southeast corner of the APE does have observable sediments; however, the ground has been recently cleared of vegetation and is highly disturbed. The inventory resulted in no sites or isolated finds of either resource being discovered within the APE.

3.5.2 Environmental Consequences – Cultural/Paleontological Resources

3.5.2.1 Alternative 1

The proposed project under this alternative would have no effect to historic properties or paleontological resources because the APE has been highly disturbed and no sites or isolated finds were discovered during the recent cultural and paleontological resources inventory.

3.5.2.2 Alternative 2

Please see the statement regarding Alternative 2 in Section 3.1.2.2, above. This statement applies to all analysis of Alternative 2.

3.6 Migratory Birds

3.6.1 Affected Environment – Migratory Birds

On January 11, 2001, President Clinton signed Executive Order 13186 (Land Bird Strategic Project) placing emphasis on conservation and management of native migratory birds. These migratory species are not protected under the Endangered Species Act, but most are protected under the Migratory Bird Treaty Act of 1918. Management for these species is based on BLM Instruction Memorandum – IM 2008-050, dated December 18, 2007 (BLM 2007). It is very unlikely that migratory bird species currently utilize the project area for foraging or nesting due to the current condition of the site.

3.6.2 Environmental Consequences – Migratory Birds

3.6.2.1 Alternative 1

Alternative 1 would not affect migratory bird species because the project area does not contain habitat capable of supporting significant numbers of migratory bird species.

If holding ponds are developed for sanitation disposal, they may be an attractant to waterfowl and shorebirds using habitat in proximity to, or flying over the project area. Waterfowl and shorebirds commonly use sewage ponds as stopover sites, but there is little to no evidence that these ponds pose a health risk to these species.

3.6.2.2 Alternative 2

Please see the statement regarding Alternative 2 in Section 3.1.2.2, above. This statement applies to all analysis of Alternative 2.

3.7 Wildlife (Including Special Status Species)

3.7.1 Affected Environment – Wildlife (Including Special Status Species)

Due to the previous disturbance of the site and prior use as a feedlot, some wildlife are likely present, but limited to common and/or non-native species that flourish in agricultural settings. These likely include a few rodent and bird species (e.g., house mice (*Mus musculus*), deer mice (*Peromyscus maniculatuss*), European starlings (*Sturnus vulgaris*), and house sparrows *Passer domestucus*)). No known BLM Special Status Species (SSS) occur on the project area.

3.7.2 Environmental Consequences – Wildlife (Including Special Status Species)

3.7.2.1 Alternative 1

Effects to wildlife would be negligible because of the lack of habitat and wildlife species present. Alternative 1 would not affect SSS because no SSS occur on the project area, and the site does not currently contain habitat capable of supporting any SSS.

3.7.2.2 Alternative 2

Please see the statement regarding Alternative 2 in Section 3.1.2.2, above. This statement applies to all analysis of Alternative 2.

3.8 Special Status Plants

3.8.1 Affected Environment – Special Status Plants

Due to the previous disturbance of the site and prior use as a feedlot, no special status plants are known or expected to be present. No previous special status plant inventory has been conducted.

3.8.2 Environmental Consequences – Special Status Plants

3.8.2.1 Alternative 1

There are no special status plants identified in the project are, therefore, no effects would occur.

3.8.2.2 Alternative 2

Please see the statement regarding Alternative 2 in Section 3.1.2.2, above. This statement applies to all analysis of Alternative 2.

3.9 Economic and Social Values

3.9.1 Affected Environment – Economic and Social Values

This socioeconomic analysis will focus on Owyhee County, Idaho, where this project is located. Owyhee County is the second-largest county in the state and covers 7,639 square miles. The population in Owyhee County in 2010 was 11,389, an increase of 7 percent from the year 2000, compared to an 18 percent increase throughout the state of Idaho over that same time period. The population density is only1.5 people per square mile, and most of the county residents enjoy a largely rural lifestyle. Residents of the Treasure Valley come to the public lands to recreate on weekends and during hunting and fishing seasons. In 2010, the median age in the county was 35.3 years, almost three years older than the median age in 2000 and close to the median age of 36.3 for the entire state. Almost one-third of county residents are under the age of 18 and more than 20 percent of residents are age 45 to 64. The population in the baby boomer generation increased almost 26 percent from 2000 to 2010. Southwest Idaho is projected to grow by more than 95,000 people by the year 2020, and 77,000 of these people will live in Ada or Canyon Counties (Gardner & Zelus, 2009).

Unemployment in Owyhee County in 2010 was 11 percent, compared to 8.8 percent in Idaho and 9.6 percent nationwide in the same year. Incomes are much lower in Owyhee County than in Idaho, possibly due to employment primarily in lower-paying sectors like agriculture and social services. In 2010, the per capita income for Owyhee County was $17,373, with a median household income of $33,441; per capita income for the state was $22,518 and median household income was $46,423 (U.S. Census Bureau, 2012). More than 20 percent of people in Owyhee County live below the poverty level, which is a higher rate than Idaho's poverty rate. Table SOCE-1 shows the unemployment rate, per capita income, median household income, and poverty rate of Owyhee County.

Table 1: Economic statistics for populations in Owyhee County.

Location	Unemployment rate	Per capita income	Median household income (2010 dollars)	All people below poverty rate
Owyhee County, ID	11%	$17,373	$33,441	22.2%

As noted in the Owyhee County Natural Resources Plan (Owyhee County Commissioners, 2009) livestock grazing often plays an important social role in this area, in addition to contributing economically. It has been an important component of the local economy in Owyhee County since the late 1860s, when the establishment of the southern Idaho railroad coincided with the

migration of sheep through the Owyhee Mountains to Elko, Nevada. Horses and cattle were also introduced in the Owyhee Mountains at that time, and residents of rural Oregon, Idaho, and Nevada have since identified with the tradition, land use, and history of ranching in these areas. Maintaining the land in agriculture and ranching preserves the rural character and small-community feel, keeps the cost of living lower, and provides ample opportunities for recreation. Harp and Rimbey (2004) found that in communities in Owyhee County where ranching was an essential component, community members felt a much greater connection to each other, to the ranchers, and to local business owners. Among the Owyhee County communities surveyed for the study, Jordan Valley and Marsing communities scored higher in terms of community cohesion, owed at least in part to the large role that ranching plays in each of these communities.

3.9.2 Environmental Consequences – Economic and Social Values

3.9.2.1 Alternative 1

Approval of this proposed facility would likely result in 2-4 full time positions, providing employment opportunities to an isolated community. Additionally, more demand for high quality hay (ie. alfalfa) would exist due to feeding requirements for the WHBs. Assuming 25 pounds of forage per day per WHB for 3,500 WHBs, nearly 16,000 tons of hay would be required which could add over $3 million dollars of revenue (at $200 per ton) to the area.

3.10 Cumulative Impacts – Air Quality

3.10.1 Scope of Analysis

The geographical area analyzed and inventoried for this proposed project is limited to a one-mile radius around the project area because impacts from fugitive dust could potentially go airborne for that distance with a strong wind.

3.10.2 Affected Environment – Cumulative Impacts

The past and present projects that occur within the project area are fences, homes, agricultural fields, power lines, and a highway. Although no new projects are identified to date, future projects that are likely to occur are additional homes constructed and new agricultural development.

3.10.3 Environmental Consequences – Cumulative Impacts

3.10.3.1 Alternative 1

Past, present, and reasonably foreseeable projects in combination with this proposed project are not expected to add any additional impacts to the cumulative effects analysis area. This site has been a feedlot and has consisted of bare ground for several years and a continuation as a feedlot or a site with significant bare ground would not increase impacts as compared to previous impacts.

3.11 Cumulative Impacts – Soils/Upland Vegetation/Noxious Weeds/Riparian/Aquatic Resources/Water Quality/Cultural/Paleontological Resources/Wildlife/Migratory Birds/Special Status Plants/Economic and Social Values

3.11.1 Scope of Analysis
The geographical area analyzed and inventoried for this proposed project is limited to the approximate 80 acres comprising the project area because impacts for these resources are not expected to go beyond the project boundary.

3.11.2 Affected Environment – Cumulative Impacts
The current project that occurs within the project area is a perimeter fence (four-strand barbed wire) and nothing else. Past and presently, this site has been a feedlot, but all animals, corrals, and buildings have been completely removed.

3.11.3 Environmental Consequences – Cumulative Impacts
3.11.3.1 Alternative 1
The direct and indirect effects of this project are not felt outside this perimeter. Therefore, no additional effects would occur.

3.11.3.2 Alternative 2
Please see the statement regarding Alternative 2 in Section 3.1.2.2, above. This statement applies to all analysis of Alternative 2.

4.0 Consultation and Coordination

4.1 List of Preparers
Chris Robbins	Idaho BLM Range/Wild Horse and Burro Program Lead
Eric Mayes	Idaho BLM NEPA Coordinator
Brian McCabe	Idaho BLM NPR Team Archaeologist
Bryce Bohn	Idaho BLM Soil, Air, Water, and Riparian Program Lead
Ethan Ellsworth	Idaho BLM Wildlife Biologist

4.2 List of Agencies, Organizations, and Individuals Consulted
Shoshone Paiute Tribe
Boise District Resource Advisory Council
Owyhee County Commissioners
Other Interested Public

4.3 Public Participation
A scoping document was sent to the public on March 20, 2015 for review and comment of the proposed action and alternatives. Four letters were received in support of the project, one letter was received from the Idaho Department of Environmental Quality asking the BLM and the applicant to review the rules and regulations, one letter asked to receive the EA, and an interested public made a verbal comment to the project regarding the amount of space per animal.